



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



April 10, 2001

Lauren Levine, Senior Project Manager
United Technologies Corporation
United Technologies Building
Hartford CT 06101



RDMS DocID 00100164

Pratt & Whitney
CTD 990672081
RDMS # 100164

Re: Pratt & Whitney, Willow Brook and Willow Brook Pond; East Hartford, CT

Dear Ms. Levine:

The Permitting, Enforcement & Remediation Division of the Bureau of Water Management, and the PCBs Management Program of the Bureau of Waste Management have reviewed the following plans which were prepared by Loureiro Engineering Associates, Inc. on behalf of United Technologies Corporation, Pratt & Whitney Division:

- "Remedial Action Work Plan, United Technologies Corporation, Pratt & Whitney, Willow Brook and Willow Brook Pond, East Hartford, Connecticut", dated November 2000;
- "Request for Variance, Engineered Control of Polluted Soils, Pratt & Whitney, Willow Brook and Willow Brook Pond, East Hartford, CT", dated January 2001.

The plans propose actions to remediate sediment and soil polluted with PCBs in Willow Brook and in a wetlands area and two ponds associated with the brook in East Hartford, Connecticut. The plans propose to remove sediment to a standard of 1 mg/kg PCBs in the wetlands area, to remove soil and sediment to a standard of 25 mg/kg in other areas, and propose to use an engineered control to physically isolate and prevent migration of polluted soil and sediment which contains concentrations of PCBs exceeding 1 mg/kg.

We have met to discuss the plans and are still considering the approach. To assist us in our continued evaluation, UTC has agreed to perform surface water sampling in Willow Brook and Willow Brook Pond. In addition, we are requesting that a representative sampling be performed of sediments to evaluate the potential mobility of PCBs. Samples of sediments which are proposed to be left in place beneath the proposed cap and which contain PCBs at concentrations between 1 mg/kg and 25 mg/kg should be obtained. Mass analyses must be performed to determine the total concentrations of PCBs, and SPLP analyses should be performed to determine the potential mobility.

In addition, we are requesting a separate cost and risk evaluation for the area of the former oil-water separator between the upper and lower Willow Brook ponds. This evaluation is required to allow the Department to determine whether the difference in cost between remediation of soil in this area to the industrial/commercial direct exposure criterion of 10 mg/kg and construction and monitoring of an engineered control significantly outweighs the risk due to failure of the engineered control.

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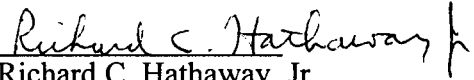
As you know, we have also requested additional details on the thickness and volume of soil and sediment which would require excavation and disposal under the alternative scenario of remediation to the 1 mg/kg standard, and on the unit costs for excavation and offsite disposal of these materials. The cost information requested, per your April 2 meeting with Lori Saliby, included transportation for PCBs less than 50ppm for which she received quotes of less than \$10 per ton to in-state facilities. Also included were disposal costs for which she received a quote of \$56.50 per ton for thermal desorption including transportation. In addition, as indicated during that meeting, some quotes were still pending and have since been received by her, specifically, in-state landfilling at either Manchester or Windsor for \$70 per ton or \$60 per ton respectively.

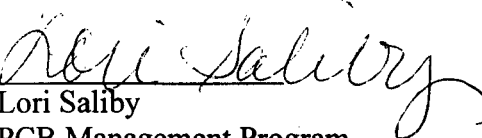
Please submit the surface water and sediment analytical results and the additional information as soon as possible to allow the Department to continue its evaluation.

Be advised that there are several additional technical comments and concerns with the remedial action plan which will be shared with you separately. Deputy Commissioner Jane Stahl has agreed to meet with UTC once we have had an opportunity to review this additional information.

If you have any questions regarding this letter please feel free to contact Richard Hathaway at (860) 424-3780, or Lori Saliby or (860) 424-3329.

Sincerely,


Richard C. Hathaway, Jr.
Permitting, Enforcement & Remediation Division
Bureau of Water Management


Lori Saliby
PCB Management Program
Bureau of Waste Management

cc: Jeffrey J. Loureiro, P.E., L.E.P., Engineering Associates, Inc.
Ernest R.P. Waterman, U.S. EPA Region 1
Kimberly Tisa, U.S. EPA Region 1
Melissa Toni, CT DEP, IWRD